Comments to the FCC

In the matter of **Proceeding number 99-325**

Filed by Jeffrey D. Luchsinger, Vice-President and Radio Station Manager North Texas Public Broadcasting Inc.

> KERA 90.1 FM June 16, 2004

1. Will authorization of supplemental audio channel capability encourage your station to convert to digital broadcasting?

Over the last several years more and more listeners have come to KERA 90.1 because of the quality and depth of our public radio news and information service. But because we focused on news and information, other segments of the public radio audience are underserved in the Dallas / Fort Worth market. Therefore, we believe that the supplemental audio channel (or "multiplexing") offered by HD Radio will allow KERA to offer more public radio service to North Texas listeners. It will extend our public service mission and allow us to offer expanded programming choices.

2. How will your station use a supplemental audio channel?

The Supplemental Audio Channel will allow KERA 90.1 to provide programming and services to audiences that are currently not being reached. A basic example of this would be to continue our public radio news and information programming on the primary channel and add a music service on the "multiplexed" channel. As consumer acceptance of the technology grows, it may make more sense for KERA to explore the possibility of providing public radio programming in Spanish to the growing Latino audience in North Texas. We might explore other new format options that would appeal to underserved audiences. Or we might find new public safety or homeland security services that could benefit the citizens of North Texas. Ultimately, we believe the Supplemental Audio Channel will be a very cost-effective way to increase the quantity of local, diverse services to Dallas / Fort Worth no matter what program or format options we might pursue.

3. Explain how a supplemental audio channel will allow your station to improve and expand services to current and new audiences. Does the availability of an additional audio programming channel enhance local offerings and encourage programming and audience diversity?

The "multicasting" capability available in the HD Radio environment will allow KERA 90.1 to leverage the investment of local and federal dollars in

the station's infrastructure. It will permit expanded use of existing content resources and provide a cost-efficient platform from which more varied and diverse programming and services can develop.

4. What local community groups or organizations could benefit from supplemental audio channel authorization and support your use of this capability?

KERA has established relationships with a number of local organizations that work with and address issues of importance. These include: DFW International, a network of over 1,600 North Texas internationally-focused civic, community and educational organizations whose mission is to promote and link North Texas ethnic and New American groups; the Dallas Museum of Natural History: the Council for American-Islamic Relations: the Dallas Museum of Art: the World Affairs Council of Greater Dallas, founded to increase international awareness in the Greater Dallas community; the League of Women Voters; the Latino Cultural Center; the Kimbell Museum of Art; the Shakespeare Festival of Dallas; the Greater Dallas Community of Churches and many others. In addition, KERA has formed its own Multi-Cultural Advisory Committee to provide input on projects and events. And, we are currently seeking funding for the KERA Ethnic Media Link. This project would put the tools of production in the hands of members of various ethnic communities in North Texas and present their stories on our air and through other ethnic media. We can foresee working with all of these groups to find ways to better serve the needs of all North Texans.

5. What regulatory steps will best support the FCC's goal of fostering and protecting public service programming?

At this time, we are requesting that the FCC permit public radio stations to expand their programming options by authorizing the use of supplemental audio channels in the HD Radio environment. Public radio has a proven track record of positive public service to American citizens. We believe that giving public radio stations flexibility in the programming of supplemental channels will allow the flexibility necessary to create new public service models. While there are many exciting ideas in the public radio system for the use of supplemental audio channels, we will also need to create workable business models to generate revenue to support those ideas. Our ability to generate additional revenue from our "multicasting" activity will only strengthen our public service in the future.